

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ULKU ROWE,

Plaintiff,

v.

GOOGLE LLC

Defendant.

No. 19-cv-08655 (LGS)

**DECLARATION OF MAYA JUMPER IN OPPOSITION TO DEFENDANT'S MOTION
FOR SUMMARY JUDGMENT AND IN SUPPORT OF PLAINTIFF'S
CROSS-MOTION FOR SUMMARY JUDGMENT**

I, Maya S. Jumper, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury as follows:

1. Attached hereto as **Exhibit 1** are true and correct copies of relevant transcript excerpts of the deposition of Mr. William Grannis taken on October 29, 2020.

2. Attached hereto as **Exhibit 2** is a true and correct copy of a document bates stamped GOOG-ROWE-00061501 to GOOG-ROWE-00061502.

3. Attached hereto as **Exhibit 3** is a true and correct copy of a document bates stamped GOOG-ROWE-00061511 to GOOG-ROWE-00061512.

4. Attached hereto as **Exhibit 4** are true and correct copies of relevant transcript excerpts of the deposition of Mr. Kevin Lucas taken on October 27, 2020.

5. Attached hereto as **Exhibit 5** is a true and correct copy of a document bates stamped GOOG-ROWE-00052153.

6. Attached hereto as **Exhibit 6** is a true and correct copy of a document bates stamped GOOG-ROWE-00017719.

7. Attached hereto as **Exhibit 7** is a true and correct copy of a document bates stamped GOOG-ROWE-00058304 to GOOG-ROWE-00058305.

8. Attached hereto as **Exhibit 8** is a true and correct copy of a document bates stamped GOOG-ROWE-00059863 and GOOG-ROWE-00059875 to GOOG-ROWE-00059876.

9. Attached hereto as **Exhibit 9** is a true and correct copy of a document bates stamped GOOG-ROWE-P-00000780.

10. Attached hereto as **Exhibit 10** are true and correct copies of relevant transcript excerpts of the deposition of Ms. Jennifer Burdis taken on December 9, 2020.

11. Attached hereto as **Exhibit 11** is a true and correct copy of a document bates stamped GOOG-ROWE-00053464.

12. Attached hereto as **Exhibit 12** are true and correct copies of relevant transcript excerpts of the deposition of Mr. Brian Stevens taken on November 13, 2020.

13. Attached hereto as **Exhibit 13** is a true and correct copy of a document bates stamped GOOG-ROWE-00018014.

14. Attached hereto as **Exhibit 14** is a true and correct copy of a document bates stamped GOOG-ROWE-00061918 to GOOG-ROWE00061919 and GOOG-ROWE-00061935.

15. Attached hereto as **Exhibit 15** is a true and correct copy of a document bates stamped GOOG-ROWE-00063516, GOOG-ROWE-00063528 and GOOG-ROWE-00063531.

16. Attached hereto as **Exhibit 16** is a true and correct copy of a document bates stamped GOOG-ROWE-00061880, GOOG-ROWE-00061883, GOOG-ROWE-00061887 to GOOG-ROWE-00061888, GOOG-ROWE-00061890 and GOOG-ROWE-00061893.

17. Attached hereto as **Exhibit 17** are true and correct copies of relevant transcript excerpts of the deposition of Mr. Benjamin Wilson taken on December 2, 2020.

18. Attached hereto as **Exhibit 18** are true and correct copies of relevant transcript excerpts of the deposition of Ms. Ulku Rowe taken on October 14, 2020 and February 23, 2021. Counsel for Plaintiff did not receive a minuscule version of the deposition transcript of Ulku Rowe. Accordingly, Exhibit 18 is a minuscule transcript created by counsel reflecting only the relevant pages of Ms. Rowe's deposition transcript.

19. Attached hereto as **Exhibit 19** is a true and correct copy of a document bates stamped GOOG-ROWE-00019103.R to GOOG-ROWE-00019104.R and GOOG-ROWE-00019106.R to GOOG-ROWE-00019108.R.

20. Attached hereto as **Exhibit 20** is a true and correct copy of a document bates stamped GOOG-ROWE-00056318.R, GOOG-ROWE-00056326.R, GOOG-ROWE-00056327.R and GOOG-ROWE-00056333.R.

21. Attached hereto as **Exhibit 21** is a true and correct copy of a document bates stamped GOOG-ROWE-00058500.

22. Attached hereto as **Exhibit 22** is a true and correct copy of a document bates stamped GOOG-ROWE-00054266.

23. Attached hereto as **Exhibit 23** is a true and correct copy of a document bates stamped GOOG-ROWE-00017999.

24. Attached hereto as **Exhibit 24** is a true and correct copy of a document bates stamped P000235.

25. Attached hereto as **Exhibit 25** is a true and correct copy of a document entitled bates stamped GOOG-ROWE-00059824 to GOOG-ROWE-00059826.

26. Attached hereto as **Exhibit 26** is a true and correct copy of a document bates stamped GOOG-ROWE-00063692.

27. Attached hereto as **Exhibit 27** is a true and correct copy of a document bates stamped GOOG-ROWE-00017920.

28. Attached hereto as **Exhibit 28** is a true and correct copy of a document bates stamped GOOG-ROWE-00017918.

29. Attached hereto as **Exhibit 29** is a true and correct copy of a document bates stamped GOOG-ROWE-00017889 to GOOG-ROWE-00017890.

30. Attached hereto as **Exhibit 30** is a true and correct copy of a document bates stamped GOOG-ROWE-00017932 to GOOG-ROWE-00017933.

31. Attached hereto as **Exhibit 31** is a true and correct copy of a document bates stamped P000194.

32. Attached hereto as **Exhibit 32** is a true and correct copy of a document bates stamped GOOG-ROWE-00017418.R.

33. Attached hereto as **Exhibit 33** is a true and correct copy of a document bates stamped GOOG-ROWE-00017410 to GOOG-ROWE-00017411.

34. Attached hereto as **Exhibit 34** is a true and correct copy of a document bates stamped as GOOG-ROWE-00054161 to GOOG-ROWE-00054162.

35. Attached hereto as **Exhibit 35** are true and correct copies of relevant transcript excerpts of the deposition of Mr. Tariq Shaukat taken on October 15, 2020.

36. Attached hereto as **Exhibit 36** is a true and correct copy of a document bates stamped GOOG-ROWE-00017639.

37. Attached hereto as **Exhibit 37** is a true and correct copy of a document bates stamped GOOG-ROWE-00017565.R.

38. Attached hereto as **Exhibit 38** are true and correct copies of relevant transcript excerpts of the deposition of Ms. Bernita Jamison taken on October 23, 2020.

39. Attached hereto as **Exhibit 39** is a true and correct copy of a document bates stamped P000102.

40. Attached hereto as **Exhibit 40** is a true and correct copy of a document bates stamped GOOG-ROWE-00018015.

41. Attached hereto as **Exhibit 41** is a true and correct copy of a document bates stamped GOOG-ROWE-00017638.

42. Attached hereto as **Exhibit 42** are true and correct copies of relevant transcript excerpts of the deposition Mr. Stuart Breslow taken on October 9, 2020.

43. Attached hereto as **Exhibit 43** is a true and correct copy of a document bates stamped GOOG-ROWE-00054267.

44. Attached hereto as **Exhibit 44** is a true and correct copy of a document bates stamped GOOG-ROWE-00018551 to GOOG-ROWE-00018552.

45. Attached hereto as **Exhibit 45** is a true and correct copy of a document bates stamped GOOG-ROWE-00060462 to GOOG-ROWE-00060463.

46. Attached hereto as **Exhibit 46** is a true and correct copy of a document bates stamped GOOG-ROWE-00060560 to GOOG-ROWE-00060562.

47. Attached hereto as **Exhibit 47** are true and correct copies of relevant transcript excerpts of the deposition of Mr. Stuart Vardaman taken on November 17, 2020.

48. Attached hereto as **Exhibit 48** is a true and correct copy of a document bates stamped as GOOG-ROWE-00022669 to GOOG-ROWE-00022670.

49. Attached hereto as **Exhibit 49** are true and correct copies of relevant transcript excerpts of the deposition of Mr. Evren Eryurek taken on December 3, 2020.

50. Attached hereto as **Exhibit 50** is a true and correct copy of a document bates stamped GOOG-ROWE-00056872.

51. Attached hereto as **Exhibit 51** is a true and correct copy of a document bates stamped GOOG-ROWE-P-00004556.

52. Attached hereto as **Exhibit 52** is a true and correct copy of a document bates stamped GOOG-ROWE-00029597.

53. Attached hereto as **Exhibit 53** is a true and correct copy of a document bates stamped GOOG-ROWE-00019290.

54. Attached hereto as **Exhibit 54** is a true and correct copy of a document bates stamped GOOG-ROWE-00034417.

55. Attached hereto as **Exhibit 55** is a true and correct copy of a document bates stamped GOOG-ROWE-00017356 to GOOG-ROWE-00017357.

56. Attached hereto as **Exhibit 56** is a true and correct copy of a document bates stamped GOOG-ROWE-00056473.

57. Attached hereto as **Exhibit 57** is a true and correct copy of a document bates stamped GOOG-ROWE-00059503.

58. Attached hereto as **Exhibit 58** is a true and correct copy of a document bates stamped GOOG-ROWE-00058796.

59. Attached hereto as **Exhibit 59** is a true and correct copy of a bates stamped GOOG-ROWE-00017404.RR

60. Attached hereto as **Exhibit 60** is a true and correct copy of a document bates stamped GOOG-ROWE-00017706.R to GOOG-ROWE-00017708.R.

61. Attached hereto as **Exhibit 61** is a true and correct copy of a document bates stamped GOOG-ROWE-00078058.

62. Attached hereto as **Exhibit 62** is a true and correct copy of a document bates stamped as GOOG-ROWE-00053811.R.

63. Attached hereto as **Exhibit 63** is a true and correct copy of a document bates stamped GOOG-ROWE-00062099.

64. Attached hereto as **Exhibit 64** is a true and correct copy of a document bates stamped GOOG-ROWE-00058837.

65. Attached hereto as **Exhibit 65** is a true and correct copy of a document bates stamped GOOG-ROWE-00017429.

66. Attached hereto as **Exhibit 66** is a true and correct copy of a document bates stamped GOOG-ROWE-00017427 to GOOG-ROWE-00017428.

67. Attached hereto as **Exhibit 67** is a true and correct copy of a document bates stamped GOOG-ROWE-00017439.

68. Attached hereto as **Exhibit 68** is a true and correct copy of a document bates stamped GOOG-ROWE-00056994, GOOG-ROWE-00057001 to GOOG-ROWE-00056702 and GOOG-ROWE-00056704.

69. Attached hereto as **Exhibit 69** is a true and correct copy of a document bates stamped P001584 to P001585.

70. Attached hereto as **Exhibit 70** is a true and correct copy of a document bates stamped as GOOG-ROWE-00034048.

71. Attached hereto as **Exhibit 71** is a true and correct copy of a document bates stamped as GOOG-ROWE-00017919.

72. Attached hereto as **Exhibit 72** is a true and correct copy of a document bates stamped as GOOG-ROWE-00053761.

73. Attached hereto as **Exhibit 73** is a true and correct copy of a document bates stamped GOOG-ROWE-00017449.

74. Attached hereto as **Exhibit 74** is a true and correct copy of a document bates stamped GOOG-ROWE-P-00000714.

75. Attached hereto as **Exhibit 75** is a true and correct copy of a document bates stamped GOOG-ROWE-00017420.

76. Attached hereto as **Exhibit 76** is a true and correct copy of a document bates stamped GOOG-ROWE-00017640.

77. Attached hereto as **Exhibit 77** is a true and correct copy of a document bates stamped GOOG-ROWE-00017643.

78. Attached hereto as **Exhibit 78** is a true and correct copy of a document bates stamped GOOG-ROWE-00017435 to GOOG-ROWE-00017436.

79. Attached hereto as **Exhibit 79** is a true and correct copy of a document bates stamped GOOG-ROWE-00056487.

80. Attached hereto as **Exhibit 80** is a true and correct copy of a document bates stamped P000706.

81. Attached hereto as **Exhibit 81** is a true and correct copy of a document bates stamped GOOG-ROWE-00017423.

82. Attached hereto as **Exhibit 82** is a true and correct copy of a document bates stamped GOOG-ROWE-00017446.

83. Attached hereto as **Exhibit 83** is a true and correct copy of a document bates stamped GOOG-ROWE-00056975 to GOOG-ROWE-00056976.

84. **Exhibit 84** is reserved.

85. **Exhibit 85** is reserved.

86. Attached hereto as **Exhibit 86** is a true and correct copy of a document bates stamped GOOG-ROWE-00017556.

87. **Exhibit 87** is reserved.

88. **Exhibit 88** is reserved.

89. Attached hereto as **Exhibit 89** is a true and correct copy of a document bates stamped GOOG-ROWE-00056512.

90. Attached hereto as **Exhibit 90** is a true and correct copy of a document bates stamped GOOG-ROWE-00017731.RR.

91. Attached hereto as **Exhibit 91** is a true and correct copy of a document bates stamped GOOG-ROWE-00056632.

92. **Exhibit 92** is reserved.

93. Attached hereto as **Exhibit 93** is a true and correct copy of a document bates stamped GOOG-ROWE-00017583.

94. Attached hereto as **Exhibit 94** is a true and correct copy of a document bates stamped GOOG-ROWE-P-00001737.

95. Attached hereto as **Exhibit 95** is a true and correct copy of a document bates stamped GOOG-ROWE-00056910.

96. Attached hereto as **Exhibit 96** is a true and correct copy of a document bates stamped as GOOG-ROWE-00017644.

97. Attached hereto as **Exhibit 97** is a true and correct copy of a document bates stamped GOOG-ROWE-00051965.

98. **Exhibit 98** is reserved.

99. Attached hereto as **Exhibit 99** is a true and correct copy of a document bates stamped GOOG-ROWE-00056273.

100. Attached hereto as **Exhibit 100** is a true and correct copy of a document bates stamped GOOG-ROWE-00017507.

101. I am an attorney in good standing at Outten & Golden LLP. I am admitted to practice in the State of New York and before this Court. I make these statements based on personal knowledge in support of Plaintiff's Opposition to Defendant's Motion for Summary Judgment and in support of Plaintiff's Cross-Motion for Summary Judgment.

Dated: December 6, 2021
New York, New York

/s/ Maya S. Jumper
Maya S. Jumper

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